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TEL:(81-3)5157-27



April 7, 2004

Securities and Exchange Commission Office of International Corporate Finance 450 Fifth Street, N.W. Washington, D.C. 20549 U. S. A.

Attn: Mr. Paul Dudek

Re:

File Number: 82-5233

Dear Sirs:

Pursuant to Rule 12g3-2(b)(1)(iii) under the Securities Exchange Act of 1934, we, as legal advisers to BELLUNA CO., LTD. (whose file number is 82-5233), enclose herewith the following information:

Press Release:

Press release dated on April 5, 2004

We hereby attach English translation of this Press Release.

Thank you for your attention.

ROCESSED APR 15 2004

Yours truly,

Shinichiro Kitamura

SK

BELLUNA CO., LTD. THE BANK OF NEW YORK

Well H

Dear Sirs:

Name of Company:

BELLUNA CO., LTD.

Code No. 9997 1st Section of the Tokyo Stock Exchange

Notice of Reset of Conversion Price of Second Unsecured Convertible Bonds

The conversion prices of Belluna's 2nd unsecured convertible bonds issued on March 27, 2002 are to be adjusted due to adjustment provision applied thereto.

1. Reset of Conversion Price;

(Name)	(Reset Exercise Price)	(Current Exercise Price)
The 2nd Unsecured Convertible Bonds With 120% Call Option	3,746.00 Yen	4,174.50 Yen

2. Effective Date: From April 19, 2004 (Japan Time)